UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Gorski & Knowlton PC

By: Carol L. Knowlton, Esquire

311 Whitehorse Ave, Suite A

Hamilton, New Jersey 08610

(609) 964-4000

(609) 585-2553 - facsimile

cknowlton@gorskiknowlton.com

Attorneys for creditors, Joseph & Joan Bongiorno

In Re:

Chapter 7

Debtor Estate of Robert Bongiorno

Case No. 18-16626-CMG

Judge: Christine M. Gravelle

Debtor(s)

Hearing Date: February 19, 2019

NOTICE OF MOTION FOR AUTHORIZATION TO FILE **LATE PROOF OF CLAIM**

To: Karen E. Bezner 567 Park Avenue, Suite 103 Scotch Plains, NJ 07076 Chapter 7 Trustee

> Adam Schneider Law Office of Adam Schneider 1141 Lincoln Square Long Branch, NJ 07740 Attorney for Debtor

Creditors as indicated on attached Service List

PLEASE TAKE NOTICE that the undersigned, as counsel for creditors, Joseph and Joan Bongiorno, shall move before the Honorable Christine M. Gravelle, U.S.B.J., United States Bankruptcy Court, 402 East State Street, Courtroom 3, Trenton, New Jersey 08608, on Tuesday, February 19, 2019, at 10:00 a.m., prevailing time, or as soon thereafter as counsel may be heard, for an Order Authorizing the filing of a Proof of Claim out of time.

In support of this motion, the undersigned shall rely upon the annexed certification, letter brief, and oral argument if timely opposition is filed.

Any opposition to this motion must be filed and served so as to be received at least seven (7) days prior to the hearing date.

Dated: January 21, 2019

GORSKI & KNOWLTON PC Attorneys for Creditors, Joseph & Joan Bongiorno

/s/ Carol L. Knowlton

BY:_____

CAROL L. KNOWLTON, ESQUIRE

SERVICE LIST

Valerie Smith, Senior Manager c/o PRA Receivables Management, LLC PO Box 41021 Norfolk, VA 23541 On behalf of Synchrony Bank

Ed Gezel, Agent
BK Servicing, LLC
PO Box 131265
Roseville, MN 55113-0011
On behalf of Mercedes-Benz Financial Services
USA LLC

R.A. Lebron, Esquire
Fein Such Kahn & Shepard, P.C.
7 Century Drive, Suite 201
Parsippany, NJ 07054
Attorneys for Wells Fargo Bank, N.A.

Glenn R. Reiser, Esquire LoFaro & Reiser, LLP 20 Court Street Hackensack, NJ 07601 Attorneys for Marete Bommen Bruce J. Duke, Esquire
Tabernacle Legal Group
PO Box 1418
648 Tabernaclle Road
Medford, NJ 08055
Attorneys for David Heffering, Apryll Heffring, &
Kenneth Trevena

Noah A. Schwartz, Esquire Davison, Eastman, Munoz, Lederman & Paone, P.A. 100 Willow Brook Road, Suite 100 Freehold, NJ 07728 Attorneys for Jeffrey T. Smith

Nicholas V. Rogers, Esquire
Phelan Hallinan Diamond & Jones, PC
400 Fellowship Road, Suite 100
Mt. Laurel, NJ 08054
Attorneys for Wells Fargo Bank, N.A.

John P. Schneider, Esquire McElroy Deutsch Mulvaney & Carpenter, LLP 570 Broad Street, Suite 1500 Newark, NJ 07102 Attorneys for Scott Robinson